

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

*Norfolk Division*

UNITED STATES OF AMERICA	)	
	)	CRIMINAL NO. 2:23-cr-51
v.	)	
	)	
JONATHAN MORRELL SCOTT,	)	
	)	
Defendant.	)	

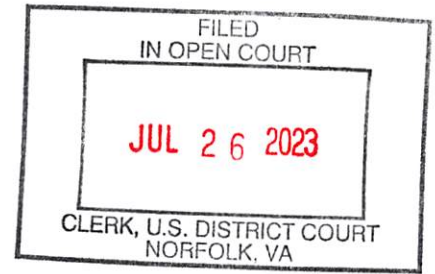
STATEMENT OF FACTS

The United States and the defendant, JONATHAN MORRELL SCOTT (hereinafter "SCOTT"), stipulate that the allegations contained in the Indictment and the following facts are true and correct, and that had the matter gone to trial the United States would have proven them beyond a reasonable doubt with admissible and credible evidence:

1. On or about August 19, 2021, in the City of Virginia Beach, within the Eastern District of Virginia, SCOTT purchased a Bersa, Model: THUNDER 380, .380 ACP caliber pistol, from Superior Pawn, a federally licensed dealer of firearms under Chapter 44, Title 18, United States Code.

2. During the course of the purchase of the referenced firearm, SCOTT unlawfully and knowingly made a false and fictitious written statement to Superior Pawn, which statement was intended to and did deceive Superior Pawn as to a fact material to the lawfulness of the sale of the firearm to SCOTT under Chapter 44 of Title 18.

3. SCOTT executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives Form 4473, Firearms Transaction Record, stating he was the actual buyer of the firearm indicated on the Form 4473, when in fact and as SCOTT then knew, he was not the actual buyer of the firearm.



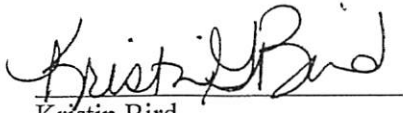
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4. SCOTT's participation in the events described was undertaken knowingly, intentionally, and unlawfully, and not as a result of an accident, mistake, or other innocent reason.

5. SCOTT acknowledges that the foregoing statement of facts does not describe all of his conduct relating to the offense charged in this case nor does it identify all of the persons with whom he may have engaged in illegal activities.

Respectfully submitted,

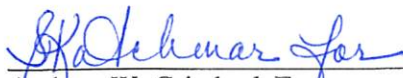
Jessica D. Aber  
United States Attorney

By:   
Kristin Bird  
Assistant United States Attorney

After consulting with my attorney, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

  
JONATHAN MORRELL SCOTT  
Defendant

I am counsel for JONATHAN MORRELL SCOTT. I have carefully reviewed the above Statement of Facts with him. To my knowledge, his decision to stipulate to these facts is an informed and voluntary one.

  
Andrew W. Grindrod, Esq.  
Attorney for Jonathan Morrell Scott

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